

EXHIBIT D

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

In Re: Valve Timing Control Devices

ALL EUROPEAN AUTO SUPPLY, INC.,
individually and on behalf of a class of all
others similarly situated,

Plaintiff

v.

AISIN SEIKI CO., LTD., AISIN
AUTOMOTIVE CASTING, LLC, KOREA
DELPHI AUTOMOTIVE SYSTEMS CORP.,
HITACHI, LTD., HITACHI AUTOMOTIVE
SYSTEMS, LTD., HITACHI AUTOMOTIVE
SYSTEMS AMERICAS, INC., MIKUNI
CORPORATION, MIKUNI AMERICAN
CORPORATION, MITSUBISHI ELECTRIC
CORPORATION, MITSUBISHI ELECTRIC
US HOLDINGS, INC., MITSUBISHI
ELECTRIC AUTOMOTIVE AMERICA,
INC.

Defendants

Master File No. 2:12-md-02311
Honorable Marianne O. Battani

Civil No. 2:17-cv-13158

ELECTRONICALLY FILED

ORAL ARGUMENT REQUESTED

**DECLARATION OF KOICHI YAMADA IN SUPPORT OF AISIN SEIKI CO., LTD. AND
AISIN AUTOMOTIVE CASTING, LLC'S MOTIONS TO DISMISS ALL EUROPEAN
AUTO SUPPLY, INC.'S CLASS ACTION COMPLAINT**

Pursuant to 28 U.S.C. § 1746, Koichi Yamada hereby declares as follows:

1. I submit this Declaration in support of Aisin Seiki Co., Ltd.'s and Aisin Automotive Casting, LLC's Motions to Dismiss All European Auto Supply, Inc.'s ("AEAS") Class Action Complaint, No. 2:17-cv-13158-JCO-APP, Sept. 26, 2017, ECF No. 1 ("Complaint"). I am a resident of Japan. I have personal knowledge of the matters contained herein.

2. I serve as a General Manager of the Legal Department of Aisin Seiki Co., Ltd. ("Aisin Seiki"). Aisin Seiki is a Japanese corporation, with its principal place of business in Kariya, Japan, that primarily develops and produces certain components for the automotive industry.

3. Aisin Automotive Casting, LLC ("Aisin Automotive Casting") is an indirect, wholly-owned subsidiary of Aisin Seiki. It is incorporated in Kentucky, and its principal place of business is in London, Kentucky. Aisin Automotive Casting produces engine-related functional and die cast automotive parts. Within the broad definition of "Valve Timing Control Devices" set forth in the Complaint, Aisin Automotive Casting only produces variable valve timing ("VVT") devices.

4. Aisin World Corp. of America ("AWA") is an indirect, wholly-owned subsidiary of Aisin Seiki. It is incorporated in Michigan, and its principal place of business is in Northville, Michigan. AWA sells automotive parts and accessories.

5. No entity within the Aisin Seiki group of companies sold VVT as a replacement part for use in the aftermarket in the United States before September 2015.

6. AWA is the only entity within the Aisin Seiki group of companies that has sold VVT in the United States.

7. No entity within the Aisin Seiki group of companies sold VVT as aftermarket replacement parts to Plaintiff AEAS before November 2015.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED ON: May 23, 2018 in Kariya, Japan.



Koichi Yamada
General Manager, Legal Department
Aisin Seiki Co., Ltd.